

Koch, Kristine

From: Koch, Kristine
Sent: Wednesday, June 24, 2015 10:00 AM
To: PARRETT Kevin; MCCLINCY Matt; Sheldrake, Sean
Cc: DeMaria, Eva; JOHNSON Keith; Grandinetti, Cami; Robinson, Deborah
Subject: RE: Scheduling Meeting with DEQ and LWG Regarding DEQ Source Control Report

As has always been the case, the assumption is that armored banks are not releasing contamination. This may prove wrong later when we're conducting long-term monitoring, but for now that is the assumption. Therefore, we are only interested in banks that are not armored. Armored banks are different from stabilized banks because banks can be stabilized from vegetation that could still release contamination and sluff.

Kristine Koch
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From: PARRETT Kevin [mailto:Parrett.Kevin@deq.state.or.us]
Sent: Tuesday, June 23, 2015 5:16 PM
To: MCCLINCY Matt; Sheldrake, Sean
Cc: Koch, Kristine; DeMaria, Eva; JOHNSON Keith; Grandinetti, Cami; Robinson, Deborah
Subject: RE: Scheduling Meeting with DEQ and LWG Regarding DEQ Source Control Report

Correct me if I'm wrong by my notes indicate that an initial screen would be based on indications of erosion. If the banks are stable, than additional investigation/remediation may not be needed.

-Kevin

From: MCCLINCY Matt
Sent: Tuesday, June 23, 2015 3:56 PM
To: 'Sheldrake, Sean'
Cc: Koch, Kristine; 'DeMaria, Eva'; JOHNSON Keith; 'Grandinetti, Cami'; Robinson, Deborah; PARRETT Kevin
Subject: RE: Scheduling Meeting with DEQ and LWG Regarding DEQ Source Control Report

Hi Sean,

I just wanted to let you know that we did discuss the application of RAO9 PRGs during the DEQ/LWG meeting last week with Kristine. Kristine, please weigh in here as appropriate, but what I took away from this discussion is that EPA will be expecting that riverbank data be screened against the riverbank PRGs. Where PRGs are exceeded, additional evaluation is needed to determine if riverbank cleanup or engineering controls are needed to prevent bank erosion to occur that could result in sediment recontamination or impair sediment MNR. Where sufficient engineering controls are already in place (e.g., riprap, bulkheads) and there is not an adjacent SMA, EPA will not be looking for additional riverbank actions.

Matt

For reference, I am also including below a write up from riverbank discussions EPA and DEQ had back in 2012.

From: Richard Muza [<mailto:Muza.Richard@epa.gov>]
Sent: Monday, March 19, 2012 7:04 AM
To: mcclincy.matt@
Cc: Kristine Koch; Chip Humphrey
Subject: EPA-Revised Riverbank Meeting Summary

Matt

Attached is EPA's revisions to the riverbank meeting summary minutes as per my voicemail of Friday afternoon. EPA staff recommend reducing the summary to a brief intro/background and four agreed-upon resolutions. If you should have any questions on this, please contact me or we can discuss any items at this afternoon's meeting on Gunderson riverbank issues.

THANKS!

Rich

(See attached file: 1-25-12 Riverbank DEQ-EPA Mtg.docx)

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EQ/EPA 1/25/12 Riverbank Meeting Summary

Attendees:

EPA- Chip Humphrey, Kristine Koch, Rich Muza
DEQ- Jim Anderson Keith Johnson, Matt McClincy

Issue and Goal of Meeting:

Clarify lead and support roles and source control expectations for the riverbank.

Background:

In the context of this summary, "riverbank source control" refers only to potential contaminated soils in riverbanks into the river, including surficial soils and when there is significant subsurface contamination mobilized by groundwater. Controlling contaminated groundwater found in river banks is beyond the scope of this summary.

DEQ believes riverbank source control at most Portland Harbor (PH) sites should be incorporated into the in-water sediment remedial design for the sediment management area (SMA) adjacent to the riverbank. It is inefficient to design and construct a riverbank source control measure down to mid-bank and assume it can then be incorporated without further modification into an in-water sediment remedy that has yet to be designed. DEQ recognizes that it is also inefficient from a cost and permitting perspective as well. It makes more sense to remove or otherwise remediate contaminated soils to the top of the bank, and incorporate the riverbank measures into the in-water remedies.

Agreements

- 1) Upland source control to top of bank - DEQ should continue to require upland source control to extend at least to the top of the bank. That includes controlling groundwater plumes that may be discharging beyond the top of the bank to the riverbank or the river. Source control should be achieved by the PH record of decision (ROD) or shortly thereafter.
- 2) Riverbank source control evaluation (SCE) - At a minimum, DEQ should require a SCE for all riverbank sites in DEQ's source control program by the PH ROD. The riverbank SCE should characterize the riverbank and identify if riverbank contamination poses a source control threat to the river, the priority of that contaminant transport pathway, and what additional source control actions DEQ may require before the PH ROD if any. If work is deferred to the in-water phase, the source control decision should be clear what the need and scope is for source control measures in riverbank soils.
- 3) Source Control Measures that go in-water - As appropriate, DEQ may want to drive certain sites into source control measures that extend in-water. This is usually based on willingness by the RP, and significant coordination with EPA. Sites like ARCO/BP (work all ready done) and EOSM (currently in design and permitting) are current examples.
- 4) Riverbank Sources not adjacent to SMAs – If DEQ determines that a bankline source control measure is necessary at a site not adjacent to or directly upstream to a SMA, DEQ will direct and oversee bankline source control measures.

From: Sheldrake, Sean [<mailto:sheldrake.sean@epa.gov>]

Sent: Tuesday, June 23, 2015 3:07 PM

To: JOHNSON Keith; Grandinetti, Cami

Cc: MCCLINCY Matt; PARRETT Kevin; DeMaria, Eva; Koch, Kristine; Robinson, Deborah

Subject: RE: Scheduling Meeting with DEQ and LWG Regarding DEQ Source Control Report

Thank you Keith for the cc. Say, did the s/c talking points get finalized that I could refer to when epa is asked to 'chime in' on the status of source control? There are some messages I think it's important for the PRPs to hear consistently from DEQ and EPA. I'll also be prepared to talk about riverbanks as needed.

Thanks-

S

Sean Sheldrake, Unit Diving Officer, RPM

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<http://yosemite.epa.gov/r10/cleanup.nsf/sites/ptldharbor>

<http://www.epa.gov/region10/dive/>

Like us on Facebook! <https://www.facebook.com/EPADivers>

From: JOHNSON Keith [<mailto:JOHNSON.Keith@deg.state.or.us>]

Sent: Tuesday, June 23, 2015 2:40 PM

To: 'Max Miller'; 'Jen Woronets'

Cc: Bob Wyatt; MCCLINCY Matt; PARRETT Kevin; Sheldrake, Sean; DeMaria, Eva

Subject: RE: Scheduling Meeting with DEQ and LWG Regarding DEQ Source Control Report

Thanks for the note Max. We will be prepared to provide that info to you at the meeting. I recommend we put together some kind of agenda to organize the 2 hours that we have. If desired, we can go light on actually walking folks through the report, and just focus on questions, assuming there are a lot of questions.

We will need a call in line for some attendees (Rita Cabral, Debbie Robinson). Other gov't attendees include me, Sean Sheldrake, Matt McClincy, Alex Liverman, Kevin Parrett, Tom Roick, Eva DeMaria, and Rose Longoria.

Keith

From: Max Miller [<mailto:max.miller@tonkon.com>]

Sent: Friday, June 12, 2015 7:59 AM

To: JOHNSON Keith; 'Jen Woronets'

Cc: Bob Wyatt; MCCLINCY Matt

Subject: RE: Scheduling Meeting with DEQ and LWG Regarding DEQ Source Control Report

Keith, now that we have EPA's new riverbank RAO in the newly released Section 2 of the FS, we will want to hear what DEQ's input might have been, what it's reaction is, and how it will effect source control measures. Also, what, if anything was DEQ's input to the riverbank designations on figure 2.2-2 of EPA's FS and does DEQ intend to comment to EPA about the figure or accompanying text?

Thanks.

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From: JOHNSON Keith [<mailto:JOHNSON.Keith@deq.state.or.us>]

Sent: Monday, June 01, 2015 2:58 PM

To: 'Jen Woronets'

Cc: Max Miller; Bob Wyatt; MCCLINCY Matt

Subject: RE: Scheduling Meeting with DEQ and LWG Regarding DEQ Source Control Report

Thanks. We know that EPA will be there (Shawn and Eva). Some MOU partners may show via phone.

Max, Bob- do you have any input ahead of time as to what the LWG would want to hear about? We are prepared to summarize what the report says, our findings and priorities.

From: Jen Woronets [<mailto:jworonets@anchorqea.com>]

Sent: Tuesday, May 26, 2015 3:48 PM

To: JOHNSON Keith

Cc: Max Miller (max@tonkon.com); Bob Wyatt; MCCLINCY Matt; Jen Woronets

Subject: RE: Scheduling Meeting with DEQ and LWG Regarding DEQ Source Control Report

Thank you, Keith. Yes, if DEQ can send that invite and let me know how many responses you receive.

I will send you a conference number and meeting location tomorrow.

Thank you for your help.

Thank you,
Jen Woronets ☺
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From: JOHNSON Keith [<mailto:JOHNSON.Keith@deg.state.or.us>]
Sent: Tuesday, May 26, 2015 3:42 PM
To: Jen Woronets
Cc: Max Miller (max@tonkon.com); Bob Wyatt; MCCLINCY Matt
Subject: RE: Scheduling Meeting with DEQ and LWG Regarding DEQ Source Control Report

We plan to have myself, Matt McClincy, Alex Liverman, Kevin Parrett and Tom Roick. There was also going to be a general invite to the MOU partners, and EPA, I believe. Would you like for DEQ to invite those parties?